

EXHIBIT 1

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

Exhibit 1

AARON LAMONT JOHNSON,
PLAINTIFF,

V.

CASE NO. CV2020-15

CURTIS JACKSON, AKA, 50 CENT,
ISIAH WRIGHT, JR,
JOHN DOE OWNER OF G UNIT FILMS
CORPORATION,
JOHN DOE OWNER OF ABC 33/40
CORPORATION,

FILED IN OFFICE

APR 28 2020

CIRCUIT CLERK
BESSEMER DIVISION
JEFFERSON COUNTY, ALABAMA

DEFENDANTS.

PLAINTIFF DEMANDS A TRIAL BY JURY.

COMPLAINT

COUNT I

COMES NOW, Plaintiff, Aaron Lamont Johnson and hereby files this Civil Action against defendants Curtis Jackson, AKA 50 Cent, Isiah Wright, Jr., John Doe owner of G Unit Films, and John Doe owner of ABC 33/40 corporation, for invasion of privacy, and violation of Plaintiffs right to publicity. Plaintiff seeks compensation and punitive awards for damages, a declaratory judgment, and injunctive relief.

JURISDICTION

1. The Court has jurisdiction over the Plaintiff's claims of invasion of privacy under the First Amendment to the United States Constitution and Section 4 of the Constitution of Alabama of 1901.

DOCUMENT 1

2. The Court has jurisdiction over the Plaintiff's claims of violation of right of publicity under §6-5-772 and §6-5-774 Alabama code of 1975.

PARTIES

3. Plaintiff Aaron Lamont Johnson is a State prisoner confined to the Alabama Department of Corrections William E. Donaldson facility addressed at 100 Warrior Lane, Bessemer, Alabama 35023.

4. Defendant Curtis Jackson is a producer of the television show "For Life". His address is ABC 33/40, 800 Concourse Pkwy #200, Hoover, Alabama 35244.

5. Defendant Isaiah Wright, Jr., is a producer of the television show "For Life". His address is ABC 33/40, 800 Concourse Pkwy, #200, Hoover, Alabama 35244.

6. Defendant John Doe is owner of G Unit Films corporation. His address is ABC 33/40, 800 Concourse Pkwy #200, Hoover, Alabama 35244.

7. Defendant John Doe is owner of ABC 33/40 corporation. His address is ABC 33/40, 800 Concourse Pkwy #200, Hoover, Alabama 35244.

VIOLATION OF PLAINTIFF'S RIGHTS TO PRIVACY

8. Plaintiff avers that the defendants without his consent benefited from the commercial use of his name and life story, by imitating him on the public television show "For Life" as fictional character "Aaron Wallace" in violation of his right to privacy under the First Amendment of the United States Constitution and Section 4 of the Alabama Constitution of 1901.

9. For over four years Plaintiff has mailed all defendants copies of his life story, court records of his criminal case (no. CC 92-3103, CC 92-3104, CC 92-3105, and CC 95-521), press releases pertaining to the court system and the prison system.

10. The defendants without Plaintiff's consent has taken his name and life story, court records of his pleadings, and press releases, and created the television show "For Life" based on a fictional character "Aaron Wallace."

11. Plaintiff avers that there are numerous similarity between his life story and the defendants fictional character "Aaron Wallace" on the television show "For Life".

12. The Plaintiff and the defendants fictional character "Aaron Wallace" both have the same first names "aaron".

13. The Plaintiff and the defendants fictional character "Aaron Wallace" both claim they are actual innocent and was wrongfully convicted of the criminal offenses they were in prison for.

14. The Plaintiff and the defendants fictional character "Aaron Wallace" both claim police informers caused them to be wrongfully convicted.

15. The Plaintiff and the defendants fictional character "Aaron Wallace" both claim their prosecutors withheld and suppressed exculpatory evidence from their defense in violation of United States Supreme court clearly established law Brady v Maryland, 10 L. Ed. 2d 215 (1963).

16. The Plaintiff and the defendants fictional character "Aaron Wallace" prosecutors sought to be elected to public office.

17. The Plaintiff and the defendant fictional character "Aaron Wallace" both have legal degrees.

18. The Plaintiff and the defendants fictional character "Aaron Wallace" both represent themselves as well as other prisoners in court and prison Administrative proceedings.

19. The Plaintiff and the defendants fictional character "Aaron Wallace" both have successfully litigated prisoners criminal cases requiring courts to release those prisoners from prison.

20. The Plaintiff and the defendants fictional character "Aaron Wallace" both have had prison Administrative decisions by wardens overturned.

21. The Plaintiff and the defendants fictional character "Aaron Wallace" both have won court judgments against wardens.

22. The Plaintiff and the defendants fictional character "Aaron Wallace" both have caucasain supporters and advocates.

23. Plaintiff avers that the defendants without his consent from at least February, 2020, until the filing of this complaint every Tuesday between the times of 9:00pm to 10:00pm have benefitted from the commercial use of his name and life story, by imitating him as fictional character "Aaron Wallace" on every episode of the television show "For Life" broadcasted on the defendants Johnson Doe public television network ABC 33/40.

COUNT II

VIOLATION OF PLAINTIFF RIGHT OF PUBLICITY

24. Plaintiff avers that the defendants without his consent benefitted from the commercial use of his name and life story by imitating him on the public television show "For Life" as fictional character "Aaron Wallace" in violation of his right of publicity, in violation of Alabama Right of Publicity Act §6-5-772 and §6-5-774 Alabama code of 1975.

25. Plaintiff avers that for over four years he has mailed all defendants copies of his life story, court records of his criminal case (no. CC 92-3103, CC 92-3104, CC 92-3105, and CC 95-521), press releases pertaining to the court system and prison system.

26. The defendants without Plaintiff's consent has taken his name and life story, court records of his pleadings, and press releases, and created the television show "For Life" based on a fictional character named "Aaron Wallace".

27. Plaintiff avers that there are numerous similarity between his life story and the defendants fictional character "Aaron Wallace" on the television show "For Life".

28. The Plaintiff and the defendants fictional character "Aaron Wallace" both have the same first name "Aaron".

29. The Plaintiff and the defendants fictional character "Aaron Wallace" both claim they are actual innocent and was wrongfully convicted of the criminal offense they were in prison for.

30. The Plaintiff and the defendants fictional character "Aaron Wallace" both claim police informers caused them to be wrongfully convicted.

31. The Plaintiff and the defendants fictional character "Aaron Wallace" both claim their prosecutors withheld and suppressed exculpatory evidence from their defense in violation of United States Supreme Court clearly established law Brady v Maryland, 10 L. Ed. 2d 215 (1963)

32. The Plaintiff and the defendants fictional character "Aaron Wallace" prosecutors sought to be elected to public office.

33. The Plaintiff and the defendants fictional character "Aaron Wallace" both have legal degrees.

34. The Plaintiff and the defendants fictional character "Aaron Wallace" both represent themselves as well as other prisoners in court and prison Administrative proceedings.

35. The Plaintiff and the defendants fictional character "Aaron Wallace" both have successfully litigated prisoners criminal cases requiring courts to release those prisoners from prison.

36. The Plaintiff and the defendants fictional character "Aaron Wallace" both have won court judgments against wardens.

37. The Plaintiff and the defendants fictional character "Aaron Wallace" both have had prison Administrative wardens decisions overturned.

38. The Plaintiff and the defendants fictional character "Aaron Wallace" both have caucasain supporters and advocates.

39. Plaintiff avers that the defendants without his consent from at least February, 2020, until the filing of this complaint every Tuesday between the times of 9:00pm to 10:00pm, have benefitted from the commercial use of his name and life story, by imitating him as fictional character "Aaron Wallace" on every episode of the television show "For Life", broadcasted on the defendant John Doe public television network ABC 33/40.

WHEREFORE, Plaintiff requests that the court grant the following relief:

A. Issue a declaratory judgment stating that

1. The defendants benefit from the commercial use of Plaintiff name and life story without his consent violates the Plaintiff's rights to privacy under the First Amendment of the United States Constitution and Section 4 of the Alabama Constitution of 1901.

B. Issue an injunction ordering defendants to:

1. Immediately stop using Plaintiff's name and life story to benefit without his consent and compensating him.

C. Award compensation damages in the following amount:

1. 100 million dollars jointly and severally for the commercial use of Plaintiff's name and life story without his consent.

D. Award punitive damages in the following amount:


1. 50 million dollars each against every defendant.

E. A public apology for using Plaintiff's name and life story without his consent.

F. Grant such other relief as it may appear that Plaintiff is entitled.

Dated: 3 / 30 20

Respectfully submitted



Aaron Lamon Johnson

AIS#190394

100 Warrior Lane

Bessemer, Alabama

35023